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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 Keon Kyun Park,
14 Petitioner,
15 v.
16 Brian E. Williams, et al.,
17 Respondents.

Case No. 2:19-cv-01298-APG-BNW

**Unopposed Motion for Extension
of Time to File Reply to Answer
[ECF No. 25]**

(First Request)

18 Petitioner Keon Kyun Park respectfully asks this Court to enter an Order
19 extending his deadline of September 8, 2020 for filing his Reply to Respondents'
20 Answer by 62 days, or until November 9, 2020. Respondents do not oppose this
21 request. This is Keon's first request for an extension.
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1 **POINTS AND AUTHORITIES**

2 On July 24, 2019, Keon timely mailed a § 2254 petition and Motion for
3 Appointment of Counsel; this court received and filed them on July 26, 2019.¹ The
4 court appointed the Federal Public Defender on August 8, 2019.² The Federal Public
5 Defender made an initial appearance on September 6, 2019.³ Keon filed his Amended
6 Petition on April 2, 2020.⁴ Respondents answered on July 16, 2020.⁵

7 Although undersigned counsel has been diligently working on Keon's reply,
8 counsel is also co-counsel on another case where the court ordered an evidentiary
9 hearing for September 8, 2020, a day before the current deadline for Keon's reply. An
10 extension of time to file the Amended Petition is necessary given the complexity of
11 Keon's case and counsel's other obligations.

12 This is Keon's first request for an extension on his reply.

13 On August 21, 202, counsel for Respondents, Deputy Attorney Katrina
14 Samuels indicated by email that Respondents do not oppose this request with the
15 understanding that the lack of objection is not waiver of any procedural defenses or
16 statute of limitations challenges or construed as agreeing with the accuracy of the
17 representations made in this Motion.

18 Accordingly, Keon respectfully asks this Court to grant this motion and enter
19 an order extending the time in which he may file his Reply to Respondents' Answer
20 by 62 days to November 9, 2020.
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24 ¹ ECF 1-1 at 45; ECF 2.

25 ² ECF 4.

26 ³ ECF 7.

27 ⁴ ECF No. 18.

⁵ ECF No. 25.

1 Dated August 25, 2020.

2 Respectfully submitted,

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4 Rene L. Valladares
Federal Public Defender

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6 /s/ Ron Y. Sung
Ron Y. Sung
7 Assistant Federal Public Defender

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10 IT IS SO ORDERED:

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13 UNITED STATES DISTRICT JUDGE

14 Dated: August 25, 2020